

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO, as representative of

THE COMMONWEALTH OF
PUERTO RICO, *et al.*

Debtors,¹

PROMESA

Title III

No. 17-BK-03283 (LTS)

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO, as a representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA

Title III

No. 17-BK-03567 (LTS)

**MOTION TO INFORM APPEARANCE OF THE AD HOC GROUP OF FGIC
INSURED NOTEHOLDERS AT AUGUST 8, 2022 PRETRIAL CONFERENCE**

To the Honorable United States District Court Judge Laura Taylor Swain:

Taconic Capital Advisors LP, Aurelius Capital Management, LP, Canyon Capital

Advisors LLC, and First Ballantyne LLC (collectively, the “Ad Hoc Group of FGIC Insured

¹ The Debtors in the various Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567- LTS) (Last Four Digits of Federal Tax ID: 3808); Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Noteholders”)² by and through its undersigned counsel, hereby respectfully submits this motion to inform (the “Informative Motion”) pursuant to the *Order Regarding Procedures For August 8, 2022, Pretrial Conference* [Commonwealth Dkt. No. 21493; HTA Dkt. No. 1269] (the “Procedures Order”),³ and respectfully states as follows:

1. Lawrence A. Larose of Sheppard Mullin Richter & Hampton LLP will appear on behalf of the Ad Hoc Group of FGIC Insured Noteholders at the August 8, 2022 Pretrial Conference (the “Pretrial Conference”), which will be conducted via Zoom in accordance with the Procedures Order. As required by the Procedures Order, a Party Appearance Sheet is annexed hereto as Exhibit A.

2. Mr. Larose, on behalf of the Ad Hoc Group of FGIC Insured Noteholders, reserves the right to be heard and present oral argument at the Pretrial Conference related to any matter (i) identified in the agenda to be filed by the Oversight Board in connection with the Pretrial Conference, (ii) pertaining to the *Third Amended Title III Plan of Adjustment of the Puerto Rico Highways and Transportation Authority* [Commonwealth Dkt. No. 21271; HTA Dkt. No. 1242], as may be amended, modified, or supplemented (the “HTA Plan”), or (iii) raised by any party at the Pretrial Conference related to the HTA Plan, the Title III cases, or otherwise which may affect the interests of the Ad Hoc Group of FGIC Insured Noteholders. The Ad Hoc Group of FGIC Insured Noteholders further reserves the right to amend this Informative Motion as needed.

² Each member of the Ad Hoc Group of FGIC Insured Noteholders files this Informative Motion exclusively on its own behalf and does not assume any fiduciary or other duties to any other member or to any other entity or individual.

³ Capitalized terms not defined herein shall have the meanings ascribed to them in the Procedures Order unless otherwise noted.

Dated: July 27, 2022

Respectfully submitted,

CÓRDOVA & DICK, LLC

/s/Brian M. Dick Biascoechea

Brian M. Dick

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*Local Counsel to the Ad Hoc Group of
FGIC Insured Noteholders*

- and -

**SHEPPARD MULLIN RICHTER & HAMPTON
LLP**

/s/Lawrence A. Larose

Lawrence A. Larose (admitted pro hac
vice)

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*Counsel to the Ad Hoc Group of FGIC Insured
Noteholders*

CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

CÓRDOVA & DICK, LLC

/s/Brian M. Dick Biascoechea

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*Local Counsel to the Ad Hoc Group of FGIC Insured
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Exhibit A

PARTY APPEARANCE SHEET

Name of Party	Ad Hoc Group of FGIC Insured Noteholders
Party Name Abbreviation (For Use with Zoom)	Ad Hoc Group
Attorney Appearance (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none"> • Name, • Email, • Law Firm, • Phone Number, • Docket Entry No. for the Attorney's Notice of Appearance • Zoom Screen Name (<u>See</u> Pretrial Conference Procedures Order, ¶ 6(a)) 	Lawrence A. Larose LLarose@sheppardmullin.com Sheppard Mullin Richter & Hampton LLP (212) 896-0627 [Dkt. No. 16976] Ad Hoc Group/ Larose, Lawrence/ Sheppard Mullin Richter & Hampton LLP
Plan Objection Docket Entry No.	
Witness List Docket Entry No.	
Exhibit List Docket Entry No.	
Other Statement Docket Entry No.	
If a Party files a supplemental Party Appearance Cover Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	
<p>Note: Pursuant to the Pretrial Conference Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other counsel shall be limited to 2 attorneys at any given time.</p> <p>Parties-in-interest not appearing by counsel must have filed a written objection on behalf of him or herself and/or a statement of support in relation to plan confirmation consistent with either the (1) Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith, and/or (2) the Confirmation Hearing Procedures Order</p>	